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February 24, 2025

**Via ECF**

Hon. Allyne R. Ross  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 10007

**Re: *United States v. Taesung Kim***  
**Docket No. 1:23-cr-00191-ARR**

Dear Judge Ross:

As Your Honor is aware, I represent Mr. Kim, who was originally arraigned in this matter on May 2, 2023, and released on bail conditions which included a secured bond, and customary travel restrictions. To date, Mr. Kim has been fully compliant with his terms of release.

I am writing to respectfully request a temporary modification of Kim's terms of release as follows. First, previously Your Honor granted our request for a temporary modification of Kim's terms of release so as to allow Kim to attend his son's graduation from United States Navy Pilot School in Pensacola, Florida on January 17, 2025. Relatedly, Mr. Kim has learned that his son has been stationed to San Diego, California. As such, Mr. Kim seeks to assist his son in relocating from Pensacola, Florida to San Diego, California. If permitted, Mr. Kim would fly from New York to Pensacola on February 27, 2025, and drive to San Diego, California with his son, arriving on March 3, 2025. Mr. Kim would fly from San Diego to New York on March 4, 2025.

Next, as the Government is aware, Mr. Kim is in the process of selling certain assets in an effort to satisfy his forfeiture obligation in this case. Once such asset is a building in which he operates a shoe store. Mr. Kim seeks to travel to Connecticut in the month of March to meet with various potential buyers of the inventory of his shoe store. Accordingly, we would seek a modification of his travel limitations simply to allow him to travel to Connecticut during the month of March, 2025, for the purpose stated herein.

I have conferred with AUSA Patrick J. Campbell, who offers his consent to this application.

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Thank you for your consideration.

Very truly yours,

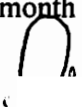
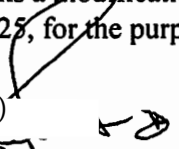
*/s/ Kevin J. Keating*

KEVIN J. KEATING

KJK/dg

cc: AUSA Patrick J. Campbell

Defense request a temporary modification of Kim's terms of release. Mr. Kim seeks to assist his son in relocating from Pensacola, Florida to San Diego, California and If permitted, Mr. Kim would fly from New York to Pensacola on February 27, 2025, and drive to San Diego, California with his son, arriving on March 3, 2025. Mr. Kim would fly from San Diego to New York on March 4, 2025. Further, defense seeks a modification of his travel to allow him to travel to Connecticut during the month of March, 2025, for the purpose stated herein is granted. So Ordered,

  
/s/(ARR)  
  
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Allyne R. Ross, U.S.D.J. 2/25/2025